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Attorneys for Plaintiff Xcentric Ventures, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

XCENTRIC VENTURES, LLC, an
Arizona limited liability company,

Plaintiff,

vs.

KARSEN, LTD., a foreign entity of
unknown origin d/b/a Scaminformer.com;
et al.,

Defendants.

Case No: 11-cv-1055-FJM

**MOTION TO EXTEND
DISPOSITIVE MOTION DEADLINE**

Plaintiff XCENTRIC VENTURES, LLC (“Plaintiff” or “Xcentric”) respectfully moves the Court for an order extending the deadline for dispositive motions. The Court’s Rule 16 Scheduling Order (Doc. #32) entered on April 6, 2012 provided that all dispositive motions must be filed by August 10, 2012. However, over the last several months Defendant EUGENE SELIHOV (“Mr. Selihov”) has substantially refused to provide crucial discovery, even after this Court granted Xcentric’s Motion to Compel. This has resulted in Xcentric filing a Motion to Strike Mr. Selihov’s Answer (Doc. #50) which currently remains pending.

MOTION TO EXTEND DISPOSITIVE MOTION DEADLINE

1 Although Xcentric believes this case could likely be resolved by dispositive
2 motion, it is impossible to make such a determination without discovery from Mr.
3 Selihov. On the other hand, if the Court grants Xcentric's Motion to Strike Mr. Selihov's
4 Answer, then a dispositive motion would be unnecessary.

5 For these reasons, Xcentric respectfully requests that the Court extend the current
6 dispositive motion deadline for at least 60 additional days—i.e. from August 10 to
7 October 10—or until such time as the Court resolves the pending Motion to Strike.

8 DATED August 10, 2012.

GINGRAS LAW OFFICE, PLLC

/S/ David S. Gingras

Attorneys for Plaintiff

XCENTRIC VENTURES, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2012 I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing, and for transmittal of a Notice of Electronic Filing to the following:

Christopher B. Ingle, Esq.
CASE ELIA, PLLC
2942 North 24th Street, Suite 114
Phoenix, AZ 85016
Attorney for Eugene Selihov

And a courtesy copy of the foregoing delivered to:
HONORABLE FREDERICK J. MARTONE
United States District Court
Sandra Day O'Connor U.S. Courthouse, Suite 526
401 West Washington Street, SPC 62
Phoenix, AZ 85003-215

/s/David S. Gingras

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